



FACILITY COMPLIANCE AUDIT REPORT

Division of Waste Management

Solid Waste Section

UNIT TYPE: (check all that apply to this audit with same Permit number)												
Lined MSWLF	X	LCID		YW		Transfer		Compost		SLAS		COUNTY: Davidson PERMIT NO.: 29-06 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW	X	White goods	X	Inciner		T&P		FIRM		
CDLF	X	Tire T&P / Collection	X	Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Audit: 03/04/08.

Date of Last Audit: 01/09/08

FACILITY NAME AND ADDRESS:

Davidson County Integrated Solid Waste Facility
 220 Davidson County Landfill Road
 Lexington, N.C. 27292

GPS COORDINATES: (Decimal Degrees) N: 35.85281 E: 80.17620
FACILITY CONTACT NAME AND PHONE NUMBER:

Charles Brushwood, Solid Waste Director
 Office- 336-242-2284
 Cell- 336-240-0303
 e-mail- Charlie.brushwood@davidsoncountync.gov

FACILITY CONTACT ADDRESS (IF DIFFERENT):

Davidson Solid Waste Management
 1242 Old U.S Highway 29
 Thomasville, North Carolina 27360

AUDIT PARTICIPANTS:

Charles Brushwood, Solid Waste Director
 Angela Jones, Administrative Assistant
 Elly Barton, HHW Facility
 Mike Lankford, HHW Facility
 Steven Sink, MSW Landfill Supervisor
 Daniel Freeman, C&D Landfill Supervisor
 Lin Rimer, Scale House, Tire Program
 Judy Morelock, Administrative Assistant
 Steve Swaim, County Recycling Coordinator
 Hugh Jernigan, N.C. Solid Waste Section
 Troy Harrison, N.C. Solid Waste Section

STATUS OF PERMIT:

Modification issued May 30, 2000 for Permit to Operate (MSW Unit, Phase 1, Area 2, Cell 1).
 Modification issued June 22, 2001 for Permit to Operate (HHW Facility).
 Modification issued November 20, 2001 for Permit to Operate (C&D Unit).
 Modification issued May 15, 2002 for Mobile Home Deconstruction and Alternative Daily Cover.
 Modification issued June 24, 2003 for Permit to Operate (MSW Unit, Phase 1, Area 2, Cell 2).
 Modification issued March 17, 2006 for Permit to Operate (C&D Unit, Phase 2)
 Permit to Construct Phase 2 Area 1 issued September 28, 2007
Permit Review Date May 30, 2010.

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PURPOSE OF AUDIT:

Comprehensive Audit

NOTICE OF VIOLATION(S) (citation and explanation):

15A North Carolina Administrative Code 13B .1626 (c) Appropriate methods such as fencing and diking shall be provided within the area to confine solid waste subject to be blown by the wind. At the conclusion of each day of operation, all windblown material resulting from the operation shall be collected and returned to the area by the owner or operator.

Observations on March 4, 2008 revealed large amounts of wind blown material accumulated in areas inside and adjacent to the MSW Landfill unit. Previous inspections conducted recently have noted minimal compliance with .1626 (c).

All wind blown material should be collected and returned to the working face of the MSW landfill immediately, and a written plan for corrective actions to maintain future compliance with .1626 (c) is to be submitted to this office no later than March 20, 2008.

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. If the violation(s) noted here continue, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

STATUS OF PAST NOTED VIOLATIONS (List all noted last audit):

NONE

AREAS OF CONCERN AND COMMENTS:

General Information

1. The facility consists of a MSW landfill, C&D landfill, HHW collection facility, tire collection site, white goods collection and processing facility, a metals collection site, a waste drop-off convenience area for cars and small trucks, a swap shop area, household textiles recycling area, electronics recycling, a drop-off convenience area for selected recyclables, and a material recovery facility for collected recyclables.
2. The service area for the facility is Davidson County.
3. Operational records for the facility are maintained at the Davidson County Solid Waste offices located at 1242 Old U.S Highway 29.
4. Observed operations at metals collection site, convenience areas, tire collection site, household textiles recycling area, electronics recycling, white goods collection and processing facility, swap shop area, and the material recovery facility.
5. The material recovery facility processes items from the Davidson County recycling program and collected recyclables from the cities of Lexington and Thomasville. The material recovery facility picking line was in operation during the inspection. To date for the current 07/08 fiscal year the facility has shipped the following amounts: Plastics (PET and HDPE) – 150 tons, Glass (Brown and Clear) – 90 tons, Electronics (All) – 33 tons, Newspaper (ONP) – 476 tons, Mixed residential paper (MRP) – 354 tons, Cardboard (OCC) – 398 tons, Office paper (OFP) – 19 tons, Auto Batteries – 12 tons, Textiles – 31 tons, Vinyl siding – 2 tons, Metals (All) – 386 tons, Rechargeable batteries - 0.25 ton.
6. Review of training records include, but not limited to the following SWANA certifications for all facility areas of operation: Charles Brushwood, Certified Landfill Manager-expires 04/15/09; Steven Sink, Certified Landfill Manager-expires 11/30/10; Karry Blaylock, Certified Landfill Manager-expires 04/28/09; Angela Jones, Landfill Operations Specialist-expires 03/27/10; Daniel Freeman, Landfill Operations Specialist-expires 02/07/10; Keith Cecil, Landfill Operations Specialist-expires 05/16/09; Daniel James, Landfill Operations Specialist-expires

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- 02/07/10; Michael Lankford, Landfill Operations Specialist-expires 02/07/10; Judy Morelock, Landfill Operations Specialist-expires 02/07/10; Jamie Jarrell, Landfill Operations Specialist-expires 05/01/10; Linda Riner, Landfill Operations Specialist-expires 02/07/10; Mark Pierce, Landfill Operations Specialist-expires 05/16/09; Sherri Robbins, Landfill Operations Specialist-expires 04/05/08; and Brant Peoples, Landfill Operations Specialist-expires 02/25/11.
7. Reviewed the proposed revised Operations Manual, submitted in conjunction with the permit to construct, Phase 2 application, dated February 2007.
 8. Conducted a review of the County tire collection program. The facility maintains a book log of registered tire haulers and generators delivering tires to the site. Tonnage totals for received tires are listed under commercial for the registered haulers/generators and separately for less than 5 tires brought in by county residents and county clean-ups. Reviewed recently processed tire certification forms. The facility received 117.43 tons of tires from commercial sources and 13.54 tons of tires from county residents and county clean-up for the month of January 2008.

MSW Landfill Unit

9. Observed operations at the MSW landfill. Currently operating in Phase 1, Area 2.
10. The MSW unit is currently receiving approximately 350-400 tons per day, the MSW Landfill received approximately 8,907 tons for the month of January 2008.
11. There is approximately 8-10 months of permitted airspace remaining for the Phase 1 MSW landfill unit. A Permit to Construct Phase 2 of the MSW landfill has been issued, and construction of the Phase 2 unit is in progress. Discussions indicated the liner installation currently being conducted will be completed by May 2008.
12. Working face was observed to be well controlled and compacted, and there was adequate daily cover from recent operations. Approved alternative daily cover (tarping system) is also being utilized. **Additional soil cover should be placed in the area of the working face tipping deck and incoming roadway on top of the landfill to the working face to cover loose materials.**
13. The Phase 1 Area 3 and parts of Area 1 have undergone closure. **The closure approval will be included in the Permit to Operate for the Phase 2 MSW landfill as per discussions with the Solid Waste Permitting staff.** The closed portions of the landfill have good vegetative cover and side slopes are stable. Passive methane vents have been installed in the closed areas. Erosion areas noted in the soil cover in storm water drainage areas on the east-facing side on Area 3 noted in a previous inspection have been repaired. Written notification of the completion of repairs was received on 10/11/07.
14. **Control and collection of wind blown materials at the MSW landfill unit was found to be inadequate. Active collection was being conducted during the inspection but large amounts of accumulated wind blown materials were observed in the MSW landfill unit and adjacent areas. All windblown materials should be collected and disposed in the MSW landfill immediately.**
15. There is adequate intermediate soil cover on the active Phase 1 Area 2 operational area. Seeding was conducted on the intermediate side slopes of Area 2 in October 2007. Observed some minor erosion areas on the south facing side slopes of Area 2, which should be repaired and re-seeded. Removal of minor amounts of waste materials visible on the surface of Area 2 due to windblown materials and/or additional soil cover should be conducted.
16. The leachate collection system lagoon at the north side of the landfill was observed to have minimal amount of collected leachate and currently has large residual capacity.
17. Roadways well maintained.
18. Monitoring wells were locked and all weather roads to the wells are maintained.
19. Reviewed Operations Manual for the MSW landfill unit and White Goods Plan for Davidson County.
20. Reviewed operational logs and records, including tonnage reports, random inspections, financial assurance approvals, leachate hauling records, leachate system inspection records, French drain inspection records, methane monitoring, and semiannual monitoring events.

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21. Reviewed random inspection program, contingency plans, and logs. The MSW landfill unit is conducting approximately three random inspections per week.
22. Financial Assurance records and approvals are on file.
23. Reviewed methane monitoring plan and methane monitoring logs. The last quarterly methane monitoring event was December 7, 2007.
24. Reviewed leachate collection system hauling logs. The facility hauled approximately 54,000 gallons of collected leachate to the Lexington Wastewater Treatment Plant during January 2008.
25. Leachate re-circulation has been approved by permit for the MSW landfill unit, but not being conducted.
26. Reviewed semi-annual ground water, surface water and leachate monitoring reports. Last semi-annual monitoring event was conducted October 10-11, 2007.

C&D Landfill

27. Observed operations at the C&D landfill.
28. The C&D landfill facility began receiving waste on December 4, 2001.
29. Site well operated and maintained, working face well controlled and delineated.
30. Excellent soil cover and adequate compaction of waste from daily operations were observed at the C&D facility.
31. Windblown materials effectively controlled and collected. Active collection of windblown materials being conducted during the inspection.
32. Excellent soil cover over intermediate areas.
33. The C&D landfill receives approximately 15-40 tons of waste per day and received approximately 755 tons for the month of January 2008.
34. Observed incoming loads, all incoming waste generated from construction and demolition operations during inspection period.
35. Deconstruction of mobile homes is approved by 05/15/02 Permit modification at the C&D landfill. No mobile home deconstructions have been conducted in recent months.
36. Metals, clean wood, cardboard and other recyclables are being pulled from the incoming waste stream and placed in proper containers at the end of each day.
37. Reviewed operational plans and tonnage reports for C&D landfill unit.
38. Reviewed random inspection program, contingency plans, and random inspection logs. The C&D landfill conducts 1 random inspection per week.
39. The C&D landfill unit has a leachate sump system located in the northwest corner of the landfill. The system has not been accumulating leachate and has not required pumping in the past year. Reviewed leachate logs for the C&D landfill unit.
40. Methane monitoring and semiannual monitoring events are conducted in conjunction with the MSW landfill events. Reviewed methane monitoring (12/07/07) and semiannual monitoring event (10/10-11/07) documentation.
41. Conducted discussions on C&D landfill rules (.0532- .0547) as pertains to the currently operating C&D landfill at the site. As per .0531 (c) (2), the Davidson County C&D Landfill must meet the requirements of .0547 (2) (a) (closure and post closure plan) and (b) (financial responsibility) which requires submittal to the Solid Waste Section by July 1, 2008.

Household Hazardous Waste Facility

42. Observed HHW facility operations and procedures, including county resident delivery of HHW to the facility during the inspection.
43. Delivery and processing operations are in covered areas. An emergency drain and sump is located in the delivery area for potential spills.
44. Reviewed HHW facility operations plan, contingency plans, spill prevention plans, and brochures given to the public.

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- 45. Reviewed HHW facility operational records including daily receiving logs, weekly staff inspection logs, weekly inventory logs, and shipping manifests.
- 46. Collected HHW at the site is packaged on site and transported/processed by Clean Harbors.
- 47. Review of facility logs indicated the facility collected 4,826 pounds of HHW for the month of February 2008. The facility typically averages 5,000-10,000 pounds per month of HHW delivered by county citizens.
- 48. The facility was observed to be clean and well maintained, with minimal inventory on site. The facility receives paints, poisons, flammable solvents, flammable solids, antifreeze, used oils, oxidizers, compressed gas, acids, batteries, and other miscellaneous HHW waste.
- 49. Non-hazardous latex paints are solidified on site for disposal in the MSW landfill.
- 50. The facility does not accept explosives, medical waste, or radioactive waste.

Please contact me if you have any questions or concerns regarding this audit report.

Hugh Jernigan

Hugh Jernigan
Regional Representative

Phone: 336-771-5093

Distribution: original signed copy to facility -- signed copy to compliance officer -- e-mail or copy to super

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